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Bureau of Land Management
Western Oregon Plan Revisions Office
P.O. Box 2965
Portland, OR 97208

RE: Public Comment period
Western Oregon Resource Management Plan

The Oregon Cattlemen's Association (OCA) was formed in 1913 in Baker County by 12 individuals who sought to advance the economic, political and social interests of the Oregon Cattle Industry. The Oregon Cattlemen's Association, the "voice of the cattle industry" in Oregon and are committed to the promotion of environmentally and socially sound practices for a stable and sustainable livestock industry, while maintaining and improving range conditions.

In the best interest of the State of Oregon and the economic welfare of the 18 western counties residing there within and in the opinion of the Oregon Cattlemen's Association, that the Bureau of Land Management Western Division adopt Alternative II for the Resource Management Plan and EIS.

Alternative II provides the best "mix" of land allocations, which meet the specific mandates of the O&C Act, Endangered Species Act, Clean Water Act and the Federal Land and Policy Management Act. It also allocates over 50% of the land base to non-commodity resources such as wildlife, fish and recreation.

Alternative II will also incorporate managed annual harvesting of about 1 percent of the current standing inventory which is much less than the forest's annual board foot growth. The most compelling piece of this alternative is that it would provide 94 percent ($108 million) of the revenues currently being received through the Secure Rural Schools "payments to counties" program, as well as provide an increase of 3,442 jobs and $136.5 million in local wages.

With the reduction of timber harvest, under the Northwest Forest Plan, rural Oregon communities are struggling to fund vital community services and these communities are situated in some of the nation's most abundant forest resource basins, which if utilized in a sustainable manner, could provide abundant financial support for critical, but currently struggling programs.

These same western Oregon counties today receive dollars in-lieu of taxes for the 2.5 million acres of O & C federal timber lands under BLM management from the "Secure Rural School and Self Determination Act of 2000." These payments, or a large percentage of them, would not be necessary with increased, sustainable harvest, and there

would be less that we taxpayers would have to pay for county government. Everyone in Oregon would benefit with financially healthier counties. The Cattlemen realize how important BLM lease land is and how important BLM management plans are to the natural resource industries and the citizens of Oregon overall.

We support the adoption of Alternative II for the Bureau of Land Management Western Oregon Resource Management Plan and EIS. We would like to offer the following comments and edits for incorporation into the final plan.

1. Chapter 1, page 60, Wildlife

Management Objective
Provide for the conservation of species that are listed or are candidates for listing under the Endangered Species Act or state listed species where the BLM have entered into a cooperative management agreement for a species.

COMMENT: The draft plan Wildlife objective refers to ESA species or candidates for listing and the objective should include all wildlife. We suggest editing the Wildlife management objective to state:

Objective 1: Maintain, restore, or enhance habitat conditions for wildlife in forest, woodland, rangeland vegetation types and riparian areas/wetlands so they provide diverse and healthy conditions for forage, water, cover, structure, and security necessary for wildlife species.

Chapter 1, page 34……Fish

Restore stream complexity.
• Restore access to stream channels for all life stages of fish species.
• Prevent livestock from causing trampling disturbances to spawning beds where federally listed salmonid fish species occur.

COMMENT: The objective for fish management should be edited to reflect a broader, achievable goal and should only reference Fish management and not livestock management. We suggest editing the Fish management objective to state:

Objective: Restore, maintain, or improve habitat to provide for diverse and self-sustaining populations of fish and other aquatic organisms.

3. Chapter 1, page 34… Grazing

Grazing Objective: Provide livestock grazing permits and leases while maintaining or improving public rangelands.

COMMENT: The objective for Grazing management should be edited to reflect a broader, achievable goal that complements the use of livestock grazing to manage vegetation. We suggest editing the Grazing management objective to state:

Objective: Provide for a sustained level of livestock grazing and utilization

consistent with other resource objectives and public land use allocations.

4. Chapter 1, page 35

Areas disturbed by natural and human-induced events, including wildland fire, prescribed burns, timber-management treatments, and juniper cuts, would be rested from livestock grazing, except where grazing would either not impede site recovery or where grazing could be used as a tool to aid in achieving recovery objectives. Livestock grazing would be resumed after soil and vegetation had sufficiently recovered to support livestock grazing.

COMMENT: This section should be expanded. It isn't a good idea to rest areas from grazing, because livestock grazing can be used to promote the recovery of vegetation under the objectives set forth where natural or human-induced management prescriptions are implemented. Also, more explanation and clarification should be added to explain what you mean by "sufficiently recovered" soil and vegetation to support livestock grazing. How would this be determined? Quantitative measurements are required to objectively assess the progress of vegetation growth and recovery after natural event or ones developed to move a site towards a desired range of future conditions.

Livestock use or "utilization" is defined as a percentage of available forage (weight or numbers of plants, twigs, etc.) consumed or harvested by livestock and can be expressed in terms of the current year's production removed. Residual plant height measurements are used to determine the herbage material left after grazing and is appropriately measured using a consistent and objective sampling procedure. This draft plan has not made any reference to livestock use and further it does not offer any cooperative and coordinated efforts that are promoting and sustaining the multiple use of the plan area for grazing. After natural or man caused events, decisions to restrict grazing should be on a site by site evaluation and depend on the site vegetative needs, not on a blanket one policy fits all situations document. In many cases, grazing in the season after a fire, after seed set can help plant restoration, help control invasive species and contribute to faster habitat recovery.

We hope you will address these important aspects of the WORMP. The WORMP must act as the roadmap for allotment management plans (and other resource plans) that will be developed during the life of the plan.

5. Affected Environment
Chapter 3, page 430

The condition within individual allotments is variable based on historic grazing levels, past management actions, and current grazing management.

• In the Coos Bay District, the vegetation on BLM land within the four grazing leases is characterized by a mix of native grass species, noxious weeds, and nonnative pasture vegetation with the nonnative pasture species being the dominant vegetation.

• In the Medford District, the vegetation within grazing allotments is characterized by a

mix of grassland, chaparral, and mixed conifers and hardwoods.

• In the Klamath Falls Resource Area of the Lakeview District, the eastern portion of the resource area is characterized by nonforested uplands, which are comprised of sagebrush and juniper communities. The western portion of the resource area is characterized by mixed conifers and hardwoods.

COMMENT: This section has not addressed how the environment will be affected under the plan. The information above describes the current condition. How is livestock grazing contributing to the vegetation management and promotion of a healthy sustainable rangeland ecosystem? How is livestock grazing contributing to the multiple use concept used in the BLM policies?

6. Environmental Consequences
Chapter 4, page 331:

Current grazing regulations direct the BLM to manage livestock grazing in accordance with the Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Public Lands Administered by the bureau of Land Management in the States of Oregon and Washington. The standards are the basis for assessing and monitoring rangeland conditions and trends. If livestock is a significant causal factor in the failure to meet a standard, management will be implemented to ensure that progress is being made toward the attainment of the standard.

COMMENT: The objectives of the rangeland health regulations are: "to promote healthy sustainable rangeland ecosystems; to accelerate restoration and improvement of public rangelands to properly functioning conditions; . . . and to provide for the sustainability of the western livestock industry and communities that are dependent upon productive, healthy public rangelands." The standards are based upon the ecological potential and capability of each site. In assessing a site's condition or degree of function, it must be understood that the evaluation compares each site to its own potential or capability.

When the standards and the social and economic goals of the planning participants are woven together in the plan goal(s), the quantifiable, time specific objective(s) of the plan are then developed. Objectives describe and quantify the desired future conditions to be achieved within a specified time frame. Each plan objective should address the physical, biological, social and economic elements identified in the plan goal.

The statement in the draft plan is not clear. The standards can be used for assessing and monitoring rangeland conditions and trends on a site specific basis, but they in no way are the stand alone monitoring required for the management of livestock grazing allotments. We hope this section will be edited and clarified to properly reflect the role of the Standards of Rangeland Health.

7. Chapter 4, page 331:

Under all alternatives, where fuels treatments would occur:
• In the short term (0-5 years), closures would rest these areas after fuels treatments if soil and vegetation are no longer capable of supporting grazing.

• *In the long term (5+ years), treatments would result in increased forage production and enhanced vigor of vegetation.*

COMMENT: The WORMP final decision is suppose to ensure that the public lands within the planning area are managed for multiple use and sustained yield, in accordance with the requirements of the Federal Land Policy and Management Act ("FLPMA") of 1976, 43 U.S.C. §§ 1701-84. As described in Chapters 1, 3, and 4 this draft plan fails to provide for sustained level of livestock grazing where the grazing objective merely suggests the BLM will issue permits. We would prefer to see more detail in sections such as Chapter 4, page 331 so that the public can understand that the decisions of the BLM are objective, based on the best scientific information, and quantifiable data available will be used to provide for a sustained level of livestock grazing and utilization consistent with other resource objectives and public land use allocations.

8. Chapter 4, page 845: Monitoring

Monitoring provides information about whether management actions were implemented as directed in the resource management plan, and examines their effectiveness in achieving desired outcomes. Monitoring can also determine whether the analysis contained in the Environmental Impact Statement was accurate.

Monitoring for the resource management plans would consist of three parts:

1. Implementation monitoring to determine if management actions follow RMP direction.

2. Effectiveness monitoring to determine if RMP objectives or desired outcomes are being met or are likely to be met.

3. Validation monitoring to determine if RMP objectives and management actions are based on correct and accurate assumptions and to validate conceptual models.

COMMENT: The monitoring discussed in the WORMP isn't clear. Monitoring doesn't provide information about whether actions took place, but provides information about whether the objectives set forth in the plan were achieved. The narrative is unclear about the amount and kind of quantitative information that will be used. As an example we think allotment monitoring must include livestock utilization monitoring to ensure that the permits are being administered properly. Grazing permits are provided specific head numbers and time in pastures as expressed in the AUMs. We suggest adding the following to the monitoring discussion.

Monitoring of livestock grazing will include recording actual use, measurements of utilization, and climatic data. Conditions and trends of resources affected by livestock grazing will be monitored to support periodic analysis/evaluation and site-specific adjustments of livestock management actions.

Utilization is defined as a percentage of available forage (weight or numbers of plants, twigs, etc.) consumed or harvested by livestock and can be expressed in terms of the current year's production removed. Residual plant height measurements are used to

determine the herbage material left after grazing and is appropriately measured using a consistent and objective sampling procedure.

Use these references and incorporate the monitoring protocols each provides:

U.S. Department of the Interior, Bureau of Land Management. 1999. Utilization Studies and Residual Measurements. Interagency Technical Reference: BLM/RS/ST-96-004 + 1730. BLM, National Applied Resources Science Center, Denver, CO. 176 pp.

U.S. Department of the Interior. 1996. Sampling Vegetation Attributes. BLM/RS/ST-96/002+1730. Bureau of Land Management, National Science and Technology Center, Denver, CO. 105 pp.

9. Glossary

COMMENT: We suggest editing the following definitions. The draft WORMP glossary definitions do not reflect the federal law and/or do not follow the BLM's own technical guide glossaries. We would like to see more consistency.

Glossary *Non point source: Water or air pollutants where the source of the pollutant is not readily identified and is diffuse, such as the runoff from urban areas, agricultural lands, or forest lands. Also see point source.*

***Glossary** Point Source: An origin of water or air pollutants that is readily identified, such as the discharge or runoff from an individual industrial plant or cattle feedlot. Also see nonpoint source.*

COMMENT:
33 USC 1362 (6) definition for a pollutant is: The term "pollutant" means dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water;

33 USC 1362(14) defines point source as: The term "point source" means any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged. This term does not include agricultural storm water discharges and return flows from irrigated agriculture;

33 USC 1362(19) further defines pollution different from a pollutant: The term "pollution" means the man-made or man-induced alteration of the chemical, physical, biological, and radiological integrity of water;

Glossary *Proper Functioning Condition: The state of a riparian wetland area having the vegetation, landform, and large woody debris that are necessary for the species, habitat, and natural processes of an area.*

COMMENT: Proper Functioning Condition is a methodology for assessing the physical functioning of riparian and wetland areas.. The PFC assessment provides a consistent approach for assessing the physical functioning of riparian-wetland areas through consideration of hydrology, vegetation, and soil/landform attributes. PFC is a state of resiliency that will allow a riparian-wetland system to hold together during a 25 to 30 year flow event, sustaining that system's ability to produce values related to both physical and biological attributes (USDI Technical Reference 1737-9 and 15).

Glossary *Riparian area: A geographic area containing an aquatic ecosystem and adjacent upland areas that directly affect it. This includes floodplain, woodlands, and all areas within a horizontal distance of approximately 100 feet from the normal line of high water of a stream channel or from the shoreline of a standing body of water.*

COMMENT: Riparian plant communities in Oregon are zones of vegetation that are parallel to the streams and have free unbound water for part of the year. The widths of the riparian plant communities vary and are dependent on whether the stream is a small tributary or a larger water body. The riparian areas refers to the transition zone that exists between the aquatic and terrestrial ecosystems; it is identified by soil characteristics that require free unbound water and is comprised of aquatic and riparian ecosystems.

COMMENT: Add this definition, which is the common and accepted definition for livestock use or utilization.

Utilization is the percentage of available forage (weight or numbers of plants, twigs, etc.) consumed or harvested by livestock and can be expressed in terms of the current year's production removed. Residual plant height measurements are used to determine the herbage material left after grazing and is appropriately measured using a consistent and objective sampling procedure.

We appreciate having the opportunity to comment on the resource management plan.

Sincerely,

Oregon Cattlemen's Association

Wm. Moore, President
Bill Hoyt, President Elect
Kay Teisl, Executive Director
Jim Welsh, Political Advocate
Pat Larson, Science Advisor